

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANISH KAPOOR,

Plaintiff,

v.

NATIONAL RIFLE ASSOCIATION OF  
AMERICA,

Defendant.

No. 1:18-cv-04252

Judge John Z. Lee

Magistrate Judge Daniel G. Martin

**DEFENDANT’S MOTION TO TRANSFER**

Defendant National Rifle Association of America (“NRA”), by and through its counsel, hereby moves to transfer this case to the U.S. Eastern District of Virginia because this case has no jurisdictional ties to the state of Illinois or the U.S. Northern District of Illinois. First, the Court should transfer this case to the U.S. Eastern District of Virginia pursuant to 28 U.S.C. § 1631 because plaintiff Anish Kapoor has failed to plead personal jurisdiction. Additionally, the case should be transferred under 28 U.S.C. § 1406 because venue is improper. And the Court should transfer this case pursuant to 28 U.S.C. § 1404 in the interests of justice and for the convenience of the witnesses and parties.

WHEREFORE, for the foregoing reasons, as set forth more fully in the accompanying memorandum of law, the Court should transfer this case to the U.S. Eastern District of Virginia.

**NOTICE OF MEET AND CONFER**

Pursuant to the Court’s Case Procedures, the NRA’s counsel met and conferred with opposing counsel regarding the relief sought in this Motion. Plaintiff’s counsel indicated that Plaintiff objects to this motion.

Respectfully submitted,

NATIONAL RIFLE ASSOCIATION OF  
AMERICA

By: /s/ Blaine C. Kimrey  
One of its attorneys

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Dated: August 15, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2018, a copy of the foregoing was electronically filed in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the court's system.

/s/ Blaine C. Kimrey